# Exhibit 11

## **Kevin Rayhill**

**From:** Stacey Grigsby <SGrigsby@BSFLLP.com>

**Sent:** Friday, June 30, 2017 1:53 PM

**To:** Kevin Rayhill; Marcy Norwood Lynch; Nicholas Widnell; Ross McSweeney; Evan North;

Bill Isaacson; Rory Skaggs; Richard Pocker; Brent Nakamura; Donald J. Campbell; J.

Colby Williams

**Cc:** Joseph Saveri; Matthew Weiler; Eric L. Cramer; MIchael Dell'Angelo; Patrick Madden;

Mark R. Suter (msuter@bm.net); Richard Koffman; Daniel Silverman; Ben Brown; Robert

C. Maysey; Jerome Elwell (jelwell@warnerangle.com); Don Springmeyer

**Subject:** RE: Le et al. v. Zuffa, LLC - Privilege Log issues

Kevin,

As you know, we have engaged in meet and confer sessions with your colleague and co-counsel, Matt Weiler, on several occasions regarding issues Plaintiffs have raised regarding Zuffa's April 7, 2017 privilege log, and have agreed to rereview a large percentage of documents on the log in an effort to avoid unnecessary motion practice and resolve outstanding issues. We are therefore surprised at your demand that Zuffa respond to your inquiries within 24 hours and produce documents within 48 hours, particularly because Plaintiffs have been in possession of these log entries for almost three months, and Matt advised us more than a week ago that he would provide us with a list of documents for us to re-consider regarding Mubadala.

Nonetheless, Zuffa has reviewed the documents attached to your e-mail, and will produce the following documents in either unredacted form or with certain redactions removed:

- ZFL-12543495 will be produced in unredacted form.
- ZFL-2521037 will be produced with revised redactions.
- ZFL-2521033 will be produced in unredacted form.
- ZFL-1901798 will be produced in unredacted form.
- ZFL-12543503 will be produced in unredacted form.

We cannot accommodate your request to produce these documents this week because we are currently processing a production to Plaintiffs, as described in my June 24 letter to Matt Weiler, the production of which was discussed during our last meet and confer with Matt in Washington, D.C. We will re-produce the above documents to Plaintiffs next week.

With regard to ZFL-1897652, ZFL-2699678, and ZFL-2699693, these documents were erroneously not included on Zuffa's privilege log and will be added to the amended version of the log.

Regards, Stacey

#### Stacey K. Grigsby

Partner

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From: Kevin Rayhill [mailto:krayhill@saverilawfirm.com]

Sent: Wednesday, June 28, 2017 7:03 PM

To: Stacey Grigsby; Marcy Norwood Lynch; Nicholas Widnell; Ross McSweeney; Evan North; William Isaacson; Rory

Skaggs; Richard Pocker; Brent Nakamura; Donald J. Campbell; J. Colby Williams

**Cc:** Joseph Saveri; Matthew Weiler; Eric L. Cramer; MIchael Dell'Angelo; Patrick Madden; Mark R. Suter (msuter@bm.net); Richard Koffman; Daniel Silverman; Ben Brown; Robert C. Maysey; Jerome Elwell

(jelwell@warnerangle.com); Don Springmeyer

Subject: Le et al. v. Zuffa, LLC - Privilege Log issues

Counsel,

Please see the attached list of questionable redactions relating to Mubadala. Please provide Plaintiffs with a list of the documents Zuffa intends to produce in unredacted form by the close of business tomorrow, and provide the unredacted documents to Plaintiffs no later than June 30.

In addition, Plaintiffs have discovered that ZFL-1897652, ZFL-2699678, and ZFL-2699693 all have redactions but are not included in the privilege log. Please notify Plaintiffs by the close of business tomorrow whether Zuffa will provide unredacted versions of these documents, or produce an updated version of the privilege log that contains appropriate descriptions of the nature of the redacted content and the basis for the privilege asserted.

Thank you.

Sincerely,

Kevin

Kevin E. Rayhill t 415.500.6800 x804 f 415.395.9940 krayhill@saverilawfirm.com



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